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June 6, 2025

VIA ECF

Hon. Sarah L. Cave, U.S.M.J. **United States District Court** Southern District of New York 500 Pearl Street, Room 1670 New York, New York 10007

Plaintiff's request for an extension of time to file his motion for default judgment is GRANTED. Plaintiff shall file his motion for default judgment by Thursday, July 10, 2025.

The Clerk of the Court is respectfully directed to close ECF No. 17.

SO ORDERED 6/9/25

Re: NY Daily Newswire, LLC v. On Location Tours, Inc.,

Case No.: 1:25-cv-02815-DEH-SLC

Dear Judge Cave:

We represent plaintiff NY Daily Newswire, LLC ("Plaintiff") in the above captioned action. Pursuant to Paragraphs I(A) and I(D) of Your Honor's Individual Practices in Civil Cases, Plaintiff respectfully moves this Court for an extension of time to and including July 10, 2025, for Plaintiff to file his motion for default judgment against defendant On Location Tours, Inc. ("Defendant").

In support of this Motion, Plaintiff includes the following:

- (1) Pursuant to Your Honor's May 16, 2025, Order (Dkt. No. 11), Plaintiff's motion for default judgment is due no later than June 10, 2025;
- (2) This is Plaintiff's first request for an extension of time;
- (3) Good cause exists for Plaintiff's request as, given the Court's preferred and general interest in resolving matters on the merits, Plaintiff has undertaken additional efforts to notify Defendant of the status of this matter including the Clerk's issuance of a Certificate of Default (Dkt. No. 16), and the requested relief will afford Defendant additional time to respond and/or appear in this matter should it choose to do so;
- (4) In that Defendant has yet to make a formal appearance in this action, there is no party with which Plaintiff could inquire as to their consent of this request.



The requested extension will not affect any other scheduled dates, is made in good faith and not for purposes of delay and granting this extension of time will not prejudice any party to this matter. Thank you for your consideration of this request.

Respectfully submitted,

/s/ Joshua D. Vera Joshua D. Vera, Esq. Counsel for Plaintiff